

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

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Federal Communications Commission
Office of Secretary

In the Matter of:

Implementation of the Local Competition
Provisions in the Telecommunications Act
of 1996

CC Docket No. 96-98

Interconnection Between Local Exchange
Carriers and Commercial Mobile Radio Service
Providers

DOCKET FILE COPY ORIGINAL

CC Docket No. 95-185

Area Code Relief Plan for Dallas and Houston,
Ordered by the Public Utility Commission of TX

NSD File No. 95-8

Administration of the North American Numbering
Plan

CC Docket No. 92-237

Proposed 708 Relief Plan and 630 Numbering
Plan Area Code by Ameritech-Illinois

IAD File No. 94-102

**ANSWER AND PETITION IN SUPPORT OF THE PETITION
BY THE WASHINGTON POST COMPANY
TO CLARIFY THE COMMISSION'S SECOND REPORT AND ORDER
(FCC 96-333 of August 8, 1996, CC Docket 96-98) AND OTHER ORDERING
INVOLVING THE NUMBERING PLAN(S)**

Communications Venture Services, Inc. hereby files support for clarification by the Commission to recognize that national assigned 555 telephone numbers be dialable as inherent 7-digit numbers. We represent approximately two dozen clients who have been assigned 555 numbers and are planning national ubiquitous 7-digit dialing.

The 555 National Exchange

All 555 exchange National numbers¹ were designed to have ubiquitous 7 digit dialing² throughout the USA, Canada, and Caribbean, where dialing plans

¹ Except 555-0100 thru 555-0199, which are reserved for the entertainment media (films, radio).

² ICCF 96-0411-014, par. 1.1, April 11, 1996 ("555 Technical Service Interconnection Arrangements", produced by the "555 Access Arrangements Workshop").

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can permit any 555 number (i.e. 555-1212) to be so dialed, with termination in any network, anywhere, including private, cellular, and satellite network(s).

Typically, the originating dial tone provider translates the dialed 555 number into a routable NPA-NXX-xxxx for access handoff to an interexchange carrier *selected by the 555 Number Assignee*, for termination at the location *designated by the 555 Assignee*. **However, translation(s) could (also) be made at the intermediate³ (i.e. IXC), or terminating (i.e. LEC) network(s).**

Industry consensus on 555 is now complete after six years of discussions on assignment and activation (technical interconnection arrangements). The Industry has now finally approved the interconnection arrangements.⁴

Activation

The timing is now appropriate to begin nationwide activation⁵ of the 555 exchange in the public interest. 555 numbers are inherently "portable" since the number assignee has that number in all geographic area codes in the NANP Area (formerly World Zone 1, USA, Canada, Caribbean). Therefore, portability is a "moot" point with 555 numbers, and thus there is no reason they cannot be dialed as 7 digits (switches already give "special" treatment to 555 numbers, and the 555 NPA (area code) will never be used as an area code, thus 555 is a perfect trigger for translations).

In fact, AT & T reported to the ICCF Workshop that 10-digit 555 dialing would be more difficult to implement (submission of Bob Hirsch, AT & T representative (now

³ Fortunately, the 555 code is not available for assignment as an NPA (area code) (per "NPA Allocation Plan and Assignment Guidelines," INC 96-0308-011, par. 4.2.3., 3/8/96). Thus, any switch receiving 555 as an NPA may treat it as a trigger to perform specific routing or translations (i.e. should a 555 number be dialed as 1+555 or 0+555); alternatively the LEC/RBOC can be instructed by the number assignee to hand off specific 555 numbers to the Point-of-Presence (POP) of a selected carrier, or translate the 555 number to a routable 10-digit number or international number or private network address.

⁴ See: Industry Carriers Compatibility Forum (ICCF) document "555 Technical Service Interconnection Arrangements", ICCF 96-0411-014, adopted 4/11/96 from report of the "555 Access Arrangements Workshop". Also see: Industry Numbering Committee (INC) Document No. 94-0429-002 entitled "555 NXX Assignment Guidelines". In addition, the Information Industry Liaison Committee (IILC) Task Group has adopted 7-digit 555 dialing for both access and exchange services (IILC Issue #046, dated August, 1996). The FCC has stated that Industry consensus should not be disturbed. (Southern New England Telephone Expedited Petition for Emergency Interim Relief, Preliminary Injunction and Stay , 1995 FCC 6687, Rel DA 95-2141, 10/6/95).

⁵ Activation is required in at least 30% of the available area codes (NPA's) or States. We have taken and restate here for ourselves and our clients, the position that "available" means both exchange and access services provided at reasonable rates and with non-discriminatory interconnection access (c.f. some RBOC's have their own 555 assignments).

INC Co-Chair, entitled "Digit Analysis & Translation", to the "555 Access Arrangements Workshop" on or about November 13, 1995, ref: Sec. 2.1 & 2.2).⁶

Therefore, we support wholeheartedly the Commission's clarification, and any further Ordering provisions necessary, for ubiquitous 7-digit dialing of the 555 exchange throughout the NANP area (555 can be a typical Feature Group D access service, similar to the 950 Feature Group B access service). There is industry consensus for "ubiquitous deployment" of 555 service nationwide.⁷ The Commission has given the presumption to Industry Consensus (Southern New England Telephone Expedited Petition for Emergency Interim Relief, Preliminary Injunction and Stay, 1995 FCC 6687, Rel DA 95-2141, 10/6/95).

October 18, 1996

COMMUNICATIONS VENTURE SERVICES, INC.
AND OUR CLIENTS:


RICHARD C. BARTEL, PRESIDENT

cc: Washington Post Company
Digital Ink, Inc.

Certificate of Service

I, Richard C. Bartel, hereby certify that a copy of this Answer and Petition was mailed to the Washington Post Company and Digital Ink, Inc., c/o Henry D. Levine & D.E. Boehling, Levine, Blaszak, Block, & Boothby, 1300 Conn. Ave., NW, #500, Washington, DC 20036, on this 20th day of October, 1996.


Richard C. Bartel

⁶ Quoted in part: "If calls are dialed using seven digits, the three digit analysis currently performed in end offices would be sufficient to recognize the 555 call and initiate the necessary call processing or route the call to the tandem switch. It therefore appears that technical service interconnection arrangements for seven digit dialed 555 calls could be made available more easily than arrangements with ten digit dialed 555 calls if those calls were to be dialed with a FNPA." (Robert Hirsch, AT & T, now INC co-chair).

⁷ ICCF 96-0411-014, par. 1.1, 4/11/96. In addition, the Information Industry Liaison Committee (IILC) Task Group has adopted 7-digit 555 dialing for both access and exchange services (IILC Issue #046, dated August, 1996).